

STATE OF MINNESOTA

DISTRICT COURT

CARVER COUNTY

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special AdministrationIn the Matter of:
Estate of Prince Rogers Nelson,

Court File No. 10-PR-16-46

Decedent.

COUSINS LAW APA'S RESPONSE
TO COMERICA'S MOTION TO DISMISS

Claimant, COUSINS LAW, APA, for its response to Comerica Bank & Trust, N.A.'s Memorandum in Support of Motion to Dismiss Cousins Law, APA's Petition for Allowance of Previously Disallowed claim, states and alleges as follows:

1. As an important introduction and procedural issue, Claimant has never been legally served with Comerica's Motion to Dismiss Claimant's claim and all accompanying documents associated with same. Claimant became aware of Comerica's motion when Claimant asked Minnesota attorney Paul F. Shoemaker if he had received any notices or motions from the court related to Claimant's claim. Attorney Shoemaker advised that in fact Comerica had filed a motion and he then forwarded copies of the same to Claimant sometime on March 13, 2017. Comerica was aware of Claimant's address, email, telephone and fax numbers yet Comerica never attempted to mail, email, Fed Ex, call, fax, or otherwise serve Claimant with a copy of its'

Motion to Dismiss or supporting materials. As such, this motion is not properly before this Court.

2. Claimant's address is (and at all times relevant to the Claimant's claim has been at) 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401.
3. Claimant is represented in this matter by Patrick St. George Cousins, President of COUSINS LAW, APA, 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401. Mr. Cousins is a duly admitted and licensed attorney in the State of Florida.
4. Claimant is an interested person as defined by Minnesota law because claimant has a claim against the Estate.
5. On September 2, 2016, Claimant mailed a Written Statement of Claim to counsel for the Special Administrator in this proceeding. A copy of the claim is attached to this response and incorporated herein as Exhibit A.
6. The Special Administrator's counsel initially responded to Claimant's claim by sending a denial to Claimant of another claimant's claim, see copy attached to this response and incorporated herein as Exhibit B. The clerical error made by the Special Administrator was later corrected by action of the Claimant.
7. Claimant contacted the attorneys for the Special Administrator by telephone and left a detailed message drawing attention to the foregoing error and to request clarification as to Exhibit B. Counsel for the Special Administrator did not respond to this message. Claimant then sent a series of emails to counsel for the Special Administrator advising that Claimant had received correspondence described as Exhibit B, see copy of this email attached to this response and incorporated herein as exhibit C.
8. Sometime later, counsel for the Special Administrator attempted to send Claimant a denial of the Claimant's claim; however, counsel for the Special

Administrator mailed that correspondence (denial) to the wrong address for Claimant thus delaying Claimant's receipt of same. To the best of Claimant's knowledge, the correspondence constituting a denial of Claimant's claim by counsel for the Special Administrator was received by Claimant on or about October 27, 2016. See copy attached to this response and incorporated herein as Exhibit D.

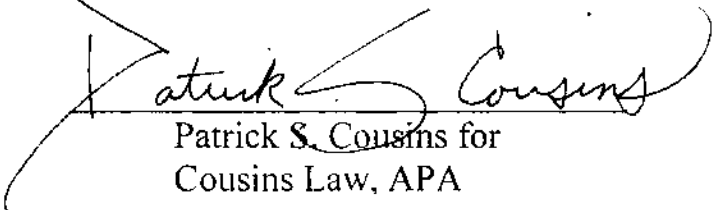
9. Thereafter on December 6, 2016, and within sixty (60) days of Claimant's receipt of the denial of Claimant's claim, Claimant made a timely filing, pursuant to the applicable law, of its' written Statement of Claim with the District Court and Special Administrator in this proceeding, see a true and correct copy attached to this response and incorporated as Exhibit E.
10. Mr. Cousins called the district court administrator's office on several occasions to ensure that Claimant's claim was timely received after mailing the same via certified United States mail. The court administrator advised that the Claimant's written statement of claim was timely filed and that Claimant needed to wait on a hearing date.
11. On January 26, 2017, after not receiving a hearing date, Claimant filed for a hearing on the petition for allowance of a claim previously disallowed, see a true and correct copy attached to this response and attached as Exhibit F.
12. The claim is proper and should be allowed because: Claimant represented the Decedent on various legal matters prior to his death and provided legal services at the request of Decedent. Claimant is entitled to payment on its Claim because Decedent has an outstanding balance due and owing to Claimant as described in Exhibits A, E and F.
13. Comerica has filed a memorandum which includes a statement of facts that are full of assumptions and errors. Claimant hereby responds to the same as follows.

14. Comerica claims that Claimant only asserts a claim against the Estate for representing Prince in a contested divorce. Comerica's statement is a half-truth at best because the documents Claimant filed identifies a broader scope of legal services that Claimant rendered to and on behalf of Mr. Nelson. Further, Mr. Nelson engaged Claimant to work on post-divorce decree matters. Claimant has a claim against the Estate for Account Stated and for Legal Services rendered based on the fact that Decedent did not contest or challenge any of the billing statements he received from Claimant during the time Claimant rendered legal services to Decedent. Claimant has records and will offer testimony by Mr. Cousins in support of Claimant's claims during an evidentiary hearing.
15. As described above, Comerica fails to advise the court that Claimant timely filed its previously disallowed claim with the court on December 6, 2016. Comerica does acknowledge on the face of its own motion that Claimant had until December 18, 2016 to file the claim that Claimant filed on December 6, 2016.
16. Comerica makes a second argument based on Minnesota's statute of limitations seeking to deny Claimant. This argument is without merit because Claimant contends that the invoice for legal services became due and owing on April 1, 2016. Claimant's initial claim made in September 2016, just 5 months after the invoice became fully due and payable, can hardly be deemed untimely under the statute of limitations. Claimant will offer testimony as to its' billing procedures, prior payments credited to or received from Mr. Nelson or which were made on behalf of his account, the relationship of Claimant's firm with Mr. Nelson and Mr. Nelson's statements on when the services would become payable which constituted a condition precedent to his full payment of the amount owed to Claimant.

17. The unsealed divorce records on which Comerica relies substantiates the fact that Claimant represented Mr. Nelson during his divorce. Further, Comerica has not challenged the amount of Claimant's bill.
18. Based upon the foregoing, the Motion to Dismiss Claimant's claim should be denied in its entirety and the Claimant's claim should be scheduled for evidentiary hearing by this Court at a date and time to be set by the Court.

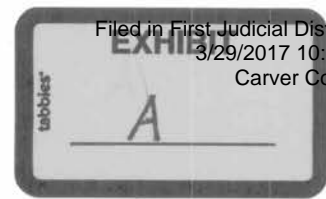
Under penalty of perjury, I declare or affirm that I have read this document and I know or believe its representations are true and complete.

March 28, 2017
Date



Patrick S. Cousins for
Cousins Law, APA

Attorney for Claimant:
COUSINS LAW, APA
319 Clematis Street
Suite 701
West Palm Beach, FL 33401
561-835-1727
5617-835-0766 (Fax)
patrick@cousinslawfirm.com



September 2, 2016

Via regular, certified (7015 0640 0002 1264 0952) and email

Laura E. Krishnan, Esq.
Natasha A. Robertson, Esq.
Stinson Leonard Street, LLP
150 South Fifth Street
Suite 2300
Minneapolis, MN 55402

Dear attorneys Krishnan and Robertson:

Good day! Thank you for your letter of August 4, 2016 regarding creditors' claims. Through this letter and pursuant the Amended Notice of Formal Appointment of Special Administrator and Notice to Creditors (Intestate), Cousins Law, APA. f/k/a Cousins Law Firm, PA ("Cousins") timely presents its claim (enclosed and attached) to the Special Administrator against the Estate of Prince Rogers Nelson, Decedent. Specifically, Prince Rogers Nelson ("Prince"), has an outstanding account stated, a running account, with Cousins for legal services. Cousins provided Prince with the account stated listing the amount due of \$599,735.63. Prince did not object, complain, or exhibit any dissatisfaction with the work or the bill. Prince has made payments from time to time and Cousins performed more services.

Cousins' claim is also supported in the alternative by a bill for legal services in the amount of \$599,735.63 which includes, amongst other things, representing Prince in a contested divorce, including responding to the complaint, attending hearings and depositions, extensive discovery, negotiations, travel to and from Minnesota and other parts of the world, preparing legal documents, etc. Prince never disputed Cousins' bill for legal services.

Should you have any questions regarding the foregoing please do not hesitate to ask.

Patrick S. Cousins

A handwritten signature in cursive that reads "Patrick S. Cousins".

Attorney, Arbitrator and Certified Mediator

PSC/krc

Comeau Building
319 Clematis Street
Suite 701
West Palm Beach
Florida 33401
T. 561.835.1727
F. 561.835.0766
W. www.cousinslawfirm.com

Cousins Law, APA319 Clematis Street, Suite 701
West Palm Beach, FL 33401

Ph: 561-835-1727

Fax: 561-835-0766

Prince Nelson
7801 Audubon Road
Chanhassen, MN
55317-8205

September 2, 2016

File #: 06-01327

Inv #: 2771

Attention: Prince R. Nelson**RE:** Nelson, Prince Rogers, In re: Nelson

Plus Previous Balance

599,735.63

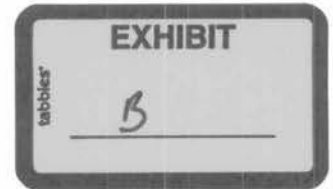
GRAND TOTAL OF ALL CHARGES**\$599,735.63****TOTAL BALANCE DUE NOW****\$599,735.63**

TAX ID Number 61-1681910



Laura E. Halferty
612.335.1763 DIRECT
612.335.1657 DIRECT FAX
laura.halferty@stinson.com

OCT 18 2016



October 14, 2016

Patrick Cousins
Cousins Law, APA
319 Clematis Street, Suite 701
West Palm Beach, FL 33410

Re: Estate of Nelson
Court File No. 10-PR-16-46

Dear Mr. Cousins:

Enclosed and served upon you is Notice of Disallowance of Claim in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

A handwritten signature in blue ink that reads "Laura E. Halferty".

Laura E. Halferty

LEH:ls

Enclosure

STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

COUNTY OF CARVER

Court File No. 10-PR-16-46

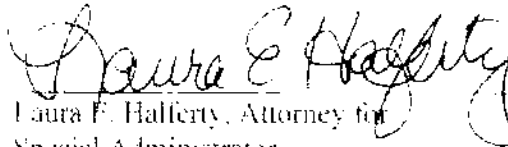
Estate of

**Prince Rogers Nelson,
Decedent****NOTICE OF DISALLOWANCE OF CLAIM**

TO: James M. Brandon, c/o Louis C. Senat, Law Offices of Louis C. Senat, PLLC, 3600 Red Road, Suite 407, Miramar, FL 33025

Your claim in an undisclosed amount, presented on July 22, 2016, is disallowed because the claim has no basis in law or fact.

Your claim will be barred unless you file a petition for allowance with the Court or commence a proceeding against the Special Administrator not later than two months after the mailing of this notice to you.



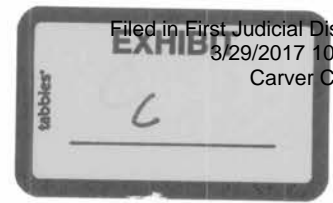
Laura E. Hafferty, Attorney for
Special Administrator

Dated: October 14, 2016

Attorney for Personal Representative
Laura E. Hafferty (311698)
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55404
Telephone: (612) 335-1500
FAX: (612) 335-1657
Email: laura.krishnan@stinson.com

NOTE: You cannot use this form to allow claims: (1) in excess of \$3,000 for personal services by an individual to the Decedent; (2) by the Personal Representative which arose before Decedent's death; or (3) in which the Personal Representative has an interest in excess of \$3,000. You must follow the procedures in Minnesota Statutes section 524.3-806(b).

For contingent or unliquidated claims, the Personal Representative can extend the two-month time period under Minnesota Statutes section 524.3-804(3).



October 24, 2016

Via regular and email

Laura E. Halferty, Esq.
Stinson Leonard Street, LLP
150 South Fifth Street
Suite 2300
Minneapolis, MN 55402

Dear Attorney Halferty:

I received the attached in the mail last week and clearly the notice of disallowance of claim does not apply to me. I immediately emailed and called you regarding same and to date I have not received a response. Is there a document that you were planning on sending me regarding my claim against the estate of Prince Rogers Nelson? Please advise.

Patrick S. Cousins

A handwritten signature in cursive script that reads "Patrick S. Cousins". The signature is written in black ink and is positioned below the typed name.

Attorney, Arbitrator and Certified Mediator

PSC/krc

Comeau Building
319 Clematis Street
Suite 701
West Palm Beach
Florida 33401
T. 561.835.1727
F. 561.835.0766
W. www.cousinslawfirm.com



Laura E. Hafferty
612.335.1783 DIRECT
612.335.1657 DIRECT FAX
laura.hafferty@stinson.com

OCT 18 2016

October 14, 2016

Patrick Cousins
Cousins Law, APA
319 Clematis Street, Suite 701
West Palm Beach, FL 33410

Re: Estate of Nelson
Court File No. 10-PR-16-46

Dear Mr. Cousins:

Enclosed and served upon you is Notice of Disallowance of Claim in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

Laura E. Hafferty

LEH/sk

Enclosure

STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

COUNTY OF CARVER

Court File No. 10-PR-16-46

Estate of
Prince Rogers Nelson,
Decedent

NOTICE OF DISALLOWANCE OF CLAIM

To: James M. Brandon, c/o Louis C. Senat, Law Offices of Louis C. Senat, PLLC, 3600 Red Road, Suite 407, Minnetonka, IL 55025

Your claim in an undisclosed amount, presented on July 22, 2016, is disallowed because the claim has no basis in law or fact.

Your claim will be barred unless you file a petition for allowance with the Court or commence a proceeding against the Special Administrator not later than two months after the mailing of this notice to you.



Laura E. Halferty, Attorney for
Special Administrator

Dated: October 14, 2016

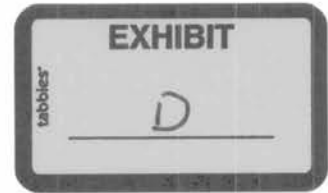
Attorney for Personal Representative
Laura E. Halferty (311698)
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55404
Telephone: (612) 335-1500
FAX: (612) 335-1657
Email: laura.krishnam@stinson.com

NOTE: You cannot use this form to allow claims: (1) in excess of \$3,000 for personal services by an individual to the Decedent; (2) by the Personal Representative which arose before Decedent's death; or (3) in which the Personal Representative has an interest in excess of \$3,000. You must follow the procedures in Minnesota Statutes section 524.3-806(b).

For contingent or unliquidated claims, the Personal Representative can extend the two-month time period under Minnesota Statutes section 524.3-804(3).



OCT 27 2016

Laura E. Halferty
612.335.1763 DIRECT
612.335.1657 DIRECT FAX
laura.halferty@stinson.com

October 18, 2016

Patrick Cousins
Cousins Law, APA
319 Clematis Street, Suite 701
West Palm Beach, FL 33410Re: Estate of Nelson
Court File No. 10-PR-16-46

Dear Mr. Cousins:

Enclosed and served upon you is Notice of Disallowance of Claim in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

A handwritten signature in blue ink that reads "Laura E. Halferty".

Laura E. Halferty

LEH:ls

Enclosure

STATE OF MINNESOTA

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

COUNTY OF CARVER

Court File No. 10-PR-16-46

Estate of
Prince Rogers Nelson,
Decedent

NOTICE OF DISALLOWANCE OF CLAIM

TO: Patrick Cousins, Cousins Law APA, 319 Clematis Street, Suite 701, West Palm Beach, FL 33410

Your claim in the amount of \$599,735.63, presented on September 2, 2016, is disallowed because the claim has no basis in law or fact.

Your claim will be barred unless you file a petition for allowance with the Court or commence a proceeding against the Special Administrator not later than two months after the mailing of this notice to you.



Laura E. Halferty, Attorney for
Special Administrator

Dated: October 14, 2016

Attorney for Personal Representative
Laura E. Halferty (311698)
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55404
Telephone: (613) 335-1500
FAX: (612) 335-1657
Email: laura.krishnan@stinson.com;

NOTE: You cannot use this form to allow claims: (1) in excess of \$3,000 for personal services by an individual to the Decedent; (2) by the Personal Representative which arose before Decedent's death; or (3) in which the Personal Representative has an interest in excess of \$3,000. You must follow the procedures in Minnesota Statutes section 524.3-806(b).

For contingent or unliquidated claims, the Personal Representative can extend the two-month time period under Minnesota Statutes section 524.3-804(3).



December 6, 2016

Via certified mail #7015 0640 0002 1262 1072
Carver County Court Administration
600 E. 4th Street
Chaska, MN 55318

Re: Prince Rogers Nelson
Court File Number: 10PR-16-46, First Judicial Probate

Dear Sir or Madam:

Please find enclosed our Written Statement of Claim.

Patrick S. Cousins


Attorney, Arbitrator and Certified Mediator

PSC/krc

cc: Laura E. Halferty, Esq. *Via certified mail #7015 0640 0002 1262 0983*

State of Minnesota

District Court

County: Carver

Judicial District: First Judicial District/Probate
Court File Number: 10-PR-16-46
Case Type: Special Administration

In the Matter of the Estate of:

WRITTEN STATEMENT OF CLAIM

Estate of Prince Rogers Nelson
(Full Name) Decedent

STATE OF MINNESOTA)
) SS
COUNTY OF Carver)

1. My name is: Patrick St. George Cousins, President of Cousins Law, APA and I have a valid claim against this estate.
 2. My address and telephone number are: 319 Clematis Street, Ste 701, West Palm Beach, Florida, 33401 561-835-1727
 3. The Estate is or will become indebted to me in the amount of \$599,735.63
 4. The nature of the claim is: Prince Rogers Nelson has an outstanding account stated, a running account stated with Cousins Law, APA, f/k/a Cousins Law Firm, PA (Cousins) for legal services rendered. In the alternative, Cousins has a bill for legal services in the amount of \$599,735.63.
 5. The claim arose prior to the death of the Decedent on or about April 1, 2016 or after the death of the Decedent, on or about _____
 6. The claim is unsecured, or secured by: _____
 7. The claim is not based on a contract which makes a provision for interest.
 8. The claim was or will be due and payable on Immediately
 9. If the claim is contingent or unliquidated, the nature of the uncertainty is as follows: _____
10. Under penalties for perjury, I declare that I have read this document and I know or believe its representations are true and complete.

Dated: December 6, 2016

Signature:

Name: Patrick St. George Cousins

Street Address: 319 Clematis Street Ste 701

City/State/Zip: West Palm Beach, Florida 33401

E-mail address: Patrick@cousinslawfirm.com



STATE OF MINNESOTA
CARVER COUNTY

DISTRICT COURT
FIRST JUDICIAL DISTRICT
Court File No. 10-PR-16-46

In re:

Estate of Prince Rogers Nelson,

Decedent.

CLAIMANT'S PETITION FOR
ALLOWANCE OF CLAIM
PREVIOUSLY DISALLOWED
AND PETITION FOR HEARING

Claimant, COUSINS LAW, APA, for its claim for its Petition for Allowance of Claim Previously Disallowed in the above Estate, states and alleges as follows:

1. Claimant's address is 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401.
2. Claimant is represented in this matter by COUSINS LAW, APA, 319 Clematis Street, Suite 701, West Palm Beach, Florida 33401.
3. Claimant is an interested person as defined by Minnesota law because claimant has a claim against the Estate.
4. On September 2, 2016, claimant mailed a Written Statement of Claim to the Special Administrator. A copy of the claim attached to this Petition and incorporated herein as Exhibit A.
5. The Special Administrator denied Claimant's claim, see copy incorporated herein as Exhibit B.
6. Thereafter on December 6, 2016 Claimant timely filed, pursuant to the applicable law, its written Statement of Claim to the District Court. A copy is attached to this Petition and incorporated as Exhibit C.

7. The claim is proper and should be allowed because: Claimant represented the Decedent for legal matters and services. Claimant is entitled to payment on its Claim because Decedent has an outstanding balance due Claimant as described in Exhibit A and B.

WHEREFORE, I request the Court:

1. Fix a date, time, and place for a hearing on this Petition;
2. Enter an Order allowing the claim; and
3. Grant such other relief as may be proper.

Under penalty of perjury, I declare or affirm that I have read this document and I know or believe its representations are true and complete.

January 26, 2017

Date

Patrick S. Cousins

Patrick S. Cousins for
Cousins Law, APA

Attorney for Claimant:
COUSINS LAW, APA
319 Clematis Street
Suite 701
West Palm Beach, FL 33401
561-835-1727
5617-835-0766 (Fax)
patrick@cousinslawfirm.com

Acknowledgement

The foregoing Affidavit of Service was executed and sworn to before me, a Notary Public, by affiant Patrick S. Cousins, a person who is personally known to me as an adult and competent, on the ____th day of January, 2017. My commission expires on: _____.

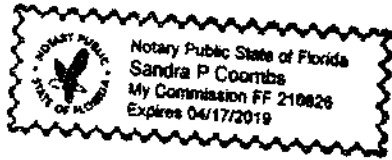
Notary Public, State of Florida
County of Palm Beach

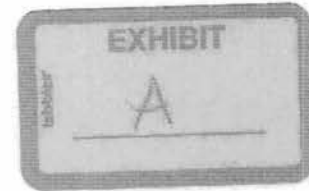
Acknowledgement

The foregoing Affidavit of Service was executed and sworn to before me, a Notary Public, by affiant Patrick S. Cousins, a person who is personally known to me as an adult and competent, on the 26th day of January, 2017. My commission expires on: 04/17/2019.

Sandra P. Coombs

Notary Public, State of Florida
County of Palm Beach





September 2, 2016

Via regular, certified (7015 0640 0002 1264 0952) and email

Laura E. Krishnan, Esq.
Natasha A. Robertson, Esq.
Stinson Leonard Street, LLP
150 South Fifth Street
Suite 2300
Minneapolis, MN 55402

Dear attorneys Krishnan and Robertson:

Good day! Thank you for your letter of August 4, 2016 regarding creditors' claims. Through this letter and pursuant to the Amended Notice of Formal Appointment of Special Administrator and Notice to Creditors (Intestate), Cousins Law, APA, f/k/a Cousins Law Firm, PA ("Cousins") timely presents its claim (enclosed and attached) to the Special Administrator against the Estate of Prince Rogers Nelson, Decedent. Specifically, Prince Rogers Nelson ("Prince"), has an outstanding account stated, a running account, with Cousins for legal services. Cousins provided Prince with the account stated listing the amount due of \$599,735.63. Prince did not object, complain, or exhibit any dissatisfaction with the work or the bill. Prince has made payments from time to time and Cousins performed more services.

Cousins' claim is also supported in the alternative by a bill for legal services in the amount of \$599,735.63 which includes, amongst other things, representing Prince in a contested divorce, including responding to the complaint, attending hearings and depositions, extensive discovery, negotiations, travel to and from Minnesota and other parts of the world, preparing legal documents, etc. Prince never disputed Cousins' bill for legal services.

Should you have any questions regarding the foregoing please do not hesitate to ask.

Patrick S. Cousins

A handwritten signature in black ink that reads "Patrick S. Cousins". The signature is written in a cursive style with a large, sweeping initial "P".

Attorney, Arbitrator and Certified Mediator

PSC/krc

Gomeau Building
319 Clematis Street
Suite 701
West Palm Beach
Florida 33401
T. 561.835.1727
F. 561.835.0766
W. www.cousinslawfirm.com

Cousins Law, APA
319 Clematis Street, Suite 701
West Palm Beach, FL 33401

Ph: 561-835-1727 Fax:561-835-0766

Prince Nelson
7801 Audubon Road
Chanhassen, MN
55317-8205

September 2, 2016

File #: 06-01327
Inv #: 2771

Attention: Prince R. Nelson

RE: Nelson, Prince Rogers. In re: Nelson

Plus Previous Balance \$99,735.63

GRAND TOTAL OF ALL CHARGES \$599,735.63

TOTAL BALANCE DUE NOW \$599,735.63

TAX ID Number 61-1681910



Laura E. Halferty
612.335.1763 DIRECT
612.335.1657 DIRECT FAX
laura.halferty@stinson.com

OCT 27 2016



October 18, 2016

Patrick Cousins
Cousins Law, APA
319 Clematis Street, Suite 701
West Palm Beach, FL 33410

Re: Estate of Nelson
Court File No. 10-PR-16-46

Dear Mr. Cousins:

Enclosed and served upon you is Notice of Disallowance of Claim in the above-entitled matter.

Sincerely,

Stinson Leonard Street LLP

Laura E. Halferty
Laura E. Halferty

LEH:ls

Enclosure

STATE OF MINNESOTA

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

Court File No. 10-PR-16-46

Estate of
Prince Rogers Nelson,
Decedent

NOTICE OF DISALLOWANCE OF CLAIM

TO: Patrick Cousins, Cousins Law APA, 319 Clematis Street, Suite 701, West Palm Beach, FL 33410

Your claim in the amount of \$599,735.63, presented on September 2, 2016, is disallowed because the claim has no basis in law or fact.

Your claim will be barred unless you file a petition for allowance with the Court or commence a proceeding against the Special Administrator not later than two months after the mailing of this notice to you.



Laura E. Halferty, Attorney for
Special Administrator

Dated: October 14, 2016

Attorney for Personal Representative
Laura E. Halferty (311698)
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55404
Telephone: (612) 335-1500
FAX: (612) 335-1657
Email: laura.krishnan@stinson.com

NOTE: You cannot use this form to allow claims: (1) in excess of \$3,000 for personal services by an individual to the Decedent; (2) by the Personal Representative which arose before Decedent's death; or (3) in which the Personal Representative has an interest in excess of \$3,000. You must follow the procedures in Minnesota Statutes section 524.3-806(b).

For contingent or unliquidated claims, the Personal Representative can extend the two-month time period under Minnesota Statutes section 524.3-804(3).



December 6, 2016

Via certified mail #7015 0640 0002 1262 1072
Carver County Court Administration
600 E. 4th Street
Chaska, MN 55318

Re: Prince Rogers Nelson
Court File Number: 10PR-16-46, First Judicial Probate

Dear Sir or Madam:

Please find enclosed our Written Statement of Claim.

Patrick S. Cousins

Attorney, Arbitrator and Certified Mediator

PSC/krc

cc: Laura E. Halferty, Esq. *Via certified mail #7015 0640 0002 1262 0983*

State of Minnesota

County
Carver

District Court

Judicial District: First Judicial District Probate
Court File No.: 10-PR-16-46
Case Type: Special Administration

In the Matter of the Estate of:

WRITTEN STATEMENT OF CLAIM

Estate of Prince Rogers Nelson
(Full Name) Decedent

STATE OF MINNESOTA)
COUNTY OF Carver) SS

1. My name is: Patrick St. George Cousins, President of Cousins Law, P.A. and I have a valid claim against this estate.
2. My address and telephone number are: 319 Clematis Street, Ste 701, West Palm Beach, Florida, 33401, 561-835-1727.
3. The Estate is or will become indebted to me in the amount of \$599,735.63.
4. The nature of the claim is: Prince Rogers Nelson has an outstanding account stated, a running account stated with Cousins Law, P.A. /k/a Cousins Law Firm, P.A. (Cousins) for legal services rendered. In the alternative, Cousins has a bill for legal services in the amount of \$599,735.63.
5. The claim arose prior to the death of the Decedent on or about April 1, 2016 or after the death of the Decedent on or about _____.
6. The claim is measured or secured by: _____.
7. The claim is not based on a contract which makes a provision for interest.
8. The claim was or will be due and payable on: Immediately.
9. If the claim is contingent or unliquidated, the nature of the contingent interest is as follows: _____.
10. Under penalty of perjury, I declare that I have read this document and I know or believe its representations are true and complete.

Date: December 6, 2016

Name: Patrick St. George Cousins
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